

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Karen L. Falenski	Debtor(s)	CHAPTER 13
THE MONEY SOURCE	Movant	
vs.		
Karen L. Falenski	Debtor(s)	NO. 17-20781 CMB
Jason Trout	Co-Mortgagor	Hearing Date: 1/31/2023
Ronda J. Winnecour	Trustee	

**MOTION OF THE MONEY SOURCE INC. TO CONTINUE HEARING  
SCHEDULED FOR JANUARY 31, 2023**

The Money Source (hereinafter “Movant”) files the within consensual Motion to Continue Hearing and in support of the Motion states as follows:

1. Movant filed a Motion to Approve a Loan Modification on October 25, 2022.
2. Debtor objected to the motion on November 11, 2022.
3. The Court conducted a hearing on December 14, 2023, adjourning the hearing to January 31, 2023 and directing the parties to see if the matter could be resolved.
4. Since the last hearing the loan has been servicer transferred to a new servicer. The new servicer is in the process of boarding the loan.
5. Our office has been in communication with Debtor’s counsel and the new servicer and we are hopeful that we will be able to resolve the matter.
6. We respectfully request a thirty (30) day continuance of the pending motion to permit the new servicer time to board the loan and discuss the matter with our office further.
7. Counsel for Debtor, Corey Sacca, Esq. has advised that he consents to the continuance request.

WHEREFORE, The Money Source respectfully requests that the Court enter an order continuing the hearing currently scheduled for January 31, 2023 for a period of thirty (30) days.

Respectfully Submitted,

Dated: 1/19/2023

By: /s/ Brian C. Nicholas, Esq.  
Brian C. Nicholas, Esq. (PA ID: 317240)  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
[bnicholas@kmlawgroup.com](mailto:bnicholas@kmlawgroup.com)  
Attorney for Movant, The Money Source